

Timothy M. Stubson, Wyo. Bar No. 6-3144
 Brandon E. Pryde, Wyo. Bar No. 8-6883
 Holly L. Tysse, Wyo. Bar No. 7-5553
 Crowley Fleck PLLP
 111 West 2nd Street, Suite 220
 Casper, WY 82601
 (P) 307-232-6901
tstubson@crowleyfleck.com
bpryde@crowleyfleck.com
htysse@crowleyfleck.com

Eugene M. LaFlamme (Admitted pro hac vice)
 Jared B. Giroux (Admitted pro hac vice)
 Jillian L. Lukens (Admitted pro hac vice)
 McCoy Leavitt Laskey, LLC
 N19 W24200 Riverwood Drive, Suite 125
 Waukesha, WI 53188
 (P) 262-522-7000
elaflamme@MLLlaw.com
jgiroux@MLLlaw.com
jlukens@MLLlaw.com

*Attorneys for Defendants,
 Walmart Inc. and Jetson Electric Bikes, LLC*

**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF WYOMING**

STEPHANIE WADSWORTH Individually and as)
 Parent and Legal Guardian of W.W., K.W., G.W.,)
 and L.W., minor children and MATTHEW)
 WADSWORTH,)

Plaintiffs,)

v.)
 WALMART INC. and JETSON ELECTRIC)
 BIKES, LLC,)

Defendants.)

Case No. 2:23-cv-00118-KHR

**SAM HUSAIN
 DECLARATION IN
 SUPPORT OF DEFENDANTS
 JETSON ELECTRIC BIKES,
 LLC AND WALMART INC.'S
 TRIAL BRIEF FOR
 FEBRUARY 28, 2025
 HEARING**

I, Sam Husain, state as follows:

1. I am the corporate representative for Jetson Electric Bikes, LLC.
2. The Jetson Glyro model hoverboard was a pre-UL 2272 hoverboard and it was not designed and manufactured to the UL 2272 standards as they did not exist at the time the Glyro model was manufactured and sold.
3. Based on my review of the expert report from William Johnson, P.E. from the *Demark v. Jetson Electric Bikes, LLC et al* case, which is part of Plaintiffs' proposed trial exhibit

243B, the Glyro model hoverboard utilized a Samsung manufactured battery pack and Samsung manufactured lithium-ion battery cells.

4. The Plasma model hoverboard did not utilize any Samsung manufactured components.

I declare under penalty of perjury that the foregoing is true and correct.

Executed: February 14, 2025

s/ Sam Husain
Sam Husain